

**FEDERAL ELECTION COMMISSION**

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FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

In the matter of:  
**SENSITIVE**

Republican Party of Minnesota  
Anthony G. Sutton, Treasurer  
Marina Taubenberger

2007 JUL 17 A 10:14  
MUR No: 5926

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

**COMPLAINT**

1. Citizens for Responsibility and Ethics in Washington ("CREW"), Melanie Sloan and Diane Gerth bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against the Republican Party of Minnesota ("RPM"), Anthony G. Sutton, treasurer, and Marina Taubenberger for direct and serious violations of the Federal Election Campaign Act ("FECA").

**Complainants**

2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws. Through its website, press releases and other methods of distribution, CREW also files complaints

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with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

4. In order to assess whether an individual, candidate, party, political committee or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, party, political committee or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if an individual, candidate, party, political committee or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all reports of receipts and disbursements required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

6. Complainant Melanie Sloan is the executive director of Citizens for Responsibility and Ethics in Washington, a citizen of the United States and a registered voter in and resident of the District of Columbia. Diane Gerth is a citizen of the United States and a registered voter in and resident of Minnesota. As registered voters, Ms.

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Sloan and Ms. Gerth are entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Sloan and Ms. Gerth are harmed when an individual, candidate, party, political committee or other regulated entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan and Ms. Gerth are further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting their ability to review campaign finance information.

#### Respondents

7. The Republican Party of Minnesota is a state committee within the meaning of 2 U.S.C. § 431(15) of FECA and, as such, is registered with the FEC. Anthony G. Sutton is the current treasurer of RPM. Mr. Sutton succeeded Marina Taubenberger, who served as treasurer of RPM throughout the 2005-2006 election cycle and, therefore, was the treasurer of RPM at the time of the events described in this complaint.

#### Factual Allegations

8. On June 2, 2007, the *Minneapolis-St. Paul Star Tribune* reported that former RPM finance director Dwight Tostenson had written a confidential memorandum to the RPM State Executive Committee on February 15, 2007 in which he alleged that RPM had "[u]nderstated its debts -- '\$100,000 plus' on [its] FEC reports . . . ." Dan Browning and Pat Doyle, Internal Complaints Roil State GOP Office, *Minneapolis-St. Paul Star Tribune* (June 2, 2007) (attached as Exhibit A). The *Star Tribune* obtained a copy of the Tostenson memorandum and posted it on its web site. Confidential Memorandum from

Dwight Tostenson to RPM State Executive Committee (Feb. 15, 2007) (attached as Exhibit B).

9. In his memorandum, Dwight Tostenson alleged that, beginning in May 2006, he had reported to the Chairman of RPM that "based upon my research and experience, I believe that the Party ha[s] been, among other things, violating FEC law by under-reporting the Party's outstanding obligations/expenses . . . ." Exhibit B. Specifically, Mr. Tostenson provided "a list of suspected illegal activities that were brought to the Chairman's attention numerous times since May 2006," including (1) "Underreporting of our debts and obligations of significant amounts (\$100,000 plus) on our FEC and EPM reports," and (2) "Significant delays in the payment of staff expense reports. FEC rules require that all expense checks be paid within 30 days or reported as a contribution." *Id.* When questioned about the allegations in his memorandum by reporters for the *Star Tribune*, Mr. Tostenson said, "Do I stand by my memo of Feb. 15<sup>th</sup>, 2007? I will tell you . . . I stand by my memo and the information that is contained in it." Exhibit A.

10. Mr. Tostenson concluded his memorandum by requesting that the RPM Executive Committee, "Conduct a full investigation and audit into the issues brought to your attention in this and other staff communications and then address those issues by holding those responsible for any illegal activity accountable, to minimize the Party's political and legal liability." Exhibit B. The *Star Tribune* reported that the treasurer of RPM, Marina Taubenberger, "voluntarily left the party organization in mid March" — approximately one month after Mr. Tostenson sent his confidential memorandum to the RPM State Executive Committee. Exhibit A.

**COUNT I**

11. FECA and FEC regulations require State committees, including RPM, to disclose on their periodic reports to the FEC "the amount and nature of outstanding debts and obligations owed by" the State committee. 2 U.S.C. § 434(b)(8); 11 C.F.R. § 104.3(d). Moreover, FEC regulations require that State committees report debts and obligations which remain outstanding continuously until they are extinguished. 11 C.F.R. § 104.11(a). Debts of \$500 or less must be reported not later than 60 days after the obligation is incurred. 11 C.F.R. § 104.11(b). Debts of more than \$500 must be reported as of the date the obligation is incurred. Id.

12. RPM and Marina Taubenberger committed multiple violations of 2 U.S.C. § 434(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a) & (b) by repeatedly failing to disclose debts and obligations totaling more than \$100,000 from at least as early as May 2006 and continuing through at least February 2007.

**COUNT II**

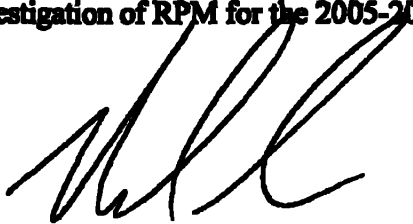
13. FEC regulations state that, "The payment by an individual from his or her personal funds, including a personal credit card, for the costs incurred in . . . obtaining goods or services that are used by or on behalf of" a State committee are contributions by that individual unless the individual is reimbursed within 60 days after the closing date of the billing statement on which the charges first appear if the payment was made using a personal credit card, or within 30 days after the date on which the expenses were incurred if a personal credit card was not used. 11 C.F.R. § 116.5(b)(2). A state committee is required to treat such an obligation owed to committee staff as an outstanding debt until reimbursed. 11 C.F.R. § 116.5(c).

14. RPM and Marina Taubenberg committed multiple violations of 11 C.F.R. § 116.5 by failing to report unreimbursed staff advances as contributions and by failing to report unreimbursed staff advances as outstanding debts from at least as early as May 2006 and continuing through at least February 2007.

### COUNT III

15. The Commission may conduct an audit and field investigation of any state committee required to file a report under 2 U.S.C. § 434 if a review of the reports filed by the state committee fail to meet the threshold requirements for substantial compliance with FECA. 2 U.S.C. § 438(b). RPM and Marina Taubenberg repeatedly filed reports that failed to accurately disclose the debts and obligations of RPM over an extended period of time beginning at least as early as May 2006 and extending through at least February 2007. Failing to disclose these debts and obligations, despite repeated warnings that the failure to do so violated FECA and FEC regulations, constitutes failure to meet the threshold requirements for substantial compliance with FECA. Accordingly, the Commission should conduct an audit and field investigation of RPM for the 2005-2006 election cycle.

**WHEREFORE, Citizens for Responsibility and Ethics in Washington requests that the Federal Election Commission conduct an investigation into these allegations, declare the respondents to have violated FECA and applicable Commission regulations, impose sanctions appropriate to these violations and take such further action, including, but not limited to, an audit and field investigation of RPM for the 2005-2006 election year, as may be appropriate.**



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**Melanie Sloan  
Executive Director  
Citizens for Responsibility and  
Ethics in Washington  
1400 Eye Street, N.W. #450  
Washington, D.C. 20005  
(202) 408-5565**

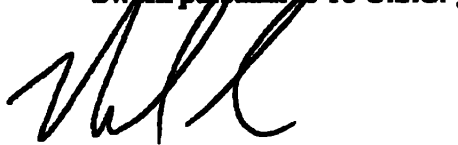
**cc: Joseph F. Stoltz  
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Assistant Staff Director  
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**Verification**

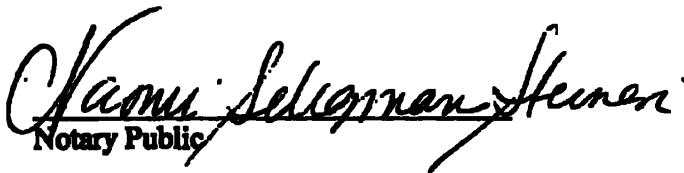
Citizens for Responsibility and Ethics in Washington, acting through Melanie Sloan, hereby verifies that the statements made in the attached Complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001



Melanie Sloan

Sworn to and subscribed before me this 16<sup>th</sup> day of July, 2007.

  
Notary Public

NAOMI SELIGMAN STEINER  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires June 30, 2011

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**EXHIBIT A**

1 of 1 DOCUMENT

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Star Tribune (Minneapolis, MN)

2007 JUL 16 P 3 47

June 3, 2007 Sunday  
Metro Edition

# **Internal complaints roil state GOP office; Staff members who asked the leadership to address questions of how money was used say they were ignored or faced retaliation.**

BYLINE: Ian Browning, Pat Doyle, Staff Writers

SECTION: NEWS; Pg. 1A

LENGTH: 1352 words

At least two staff members have left the Minnesota Republican Party since February after they complained that the party misused employee retirement money, improperly reported its finances and ignored or retaliated against staff who reported the problems.

The departures included former finance director and GOP stalwart Dwight Tostenson. He wrote in a Feb. 15 confidential memo that state GOP chairman Ron Carey fired him after he repeatedly pressed the chairman to address what Tostenson regarded as serious financial problems in the state GOP office.

"Since I started reporting these suspected violations, I have felt increasing harassment and other types of retaliation," Tostenson, the party's chief fundraiser, wrote in the memo to the party's executive committee.

Carey on Friday denied any retaliation and said any problems identified in the memo have been fixed.

"We've looked at all the issues that he raised, and where there was corrective action required, we took corrective action," Carey said. "Dwight and I came to a mutual, amicable agreement for our separation."

Tostenson's four-page memo detailed his longstanding complaints and efforts to get Carey to resolve them. In it, he urged the committee to direct Carey to conduct a full investigation and audit. The Star Tribune obtained a copy of the memo.

Carey said Friday that he has asked the committee for permission to commission an external audit.

The controversies arise as the party is gearing up for the 2008 election season, when it will play host to the Republican National Convention and attempt to reverse its setbacks of last November, when the GOP suffered heavy losses in legislative contests and a drubbing in a U.S. Senate race while narrowly reelecting Gov. Tim Pawlenty.

Carey, who's running for reelection this week as party chairman, blamed the leak of Tostenson's memo on political enemies within the Republican Party who are out to get him on the eve of the Republican state central committee meeting.

But he didn't accuse Tostenson of having political motives for writing his memo.

## **Retirement deposits disputed**

A key element of Tostenson's memo deals with his accusation that the party appears to have violated federal law by repeatedly delaying the deposit of employee payroll contributions into their retirement accounts. He said the "misappropriation" helped cover party expenses before the money was deposited.

"As reported on our payables at the state executive meetings last summer there was as much as \$12,000 not deposited at any one time," he wrote. "This represented months of paycheck withholdings by the Party which had not been deposited

within the 30-day legally required time limit."

The party offers Simple Individual Retirement Accounts for some employees. Federal law requires that money deducted from employees' checks for those accounts be deposited as soon as possible, and in no case later than 30 days after the month when it was withheld.

In cases of tardy deposits, employers may be required to make the plan whole by paying back any lost investment earnings. If they had mixed the employees' retirement money with general operating funds they could be required to pay an excise tax.

Party records show that money was withheld for employee retirement plans from September 2005 through May 2006, but Federal Election Commission (FEC) records reflect no deposits into the accounts during that period. In June 2006, the party made two ~~mis~~ payments totaling \$12,243 into the accounts.

The delay in depositing the money could have benefitted the party by giving it temporary access to the employees' funds.

Carey didn't explain why the retirement money wasn't deposited promptly.

"There seemed to be some gray areas as to what was the requirement," Carey said. Asked to explain the gray areas, he said, "I really would prefer not to get into the weeds on something like that."

"We investigated what the requirements were and made sure we were immediately in full compliance with that," he said.

Carey did not directly respond to Tostenson's claim that the employees' money was used temporarily to cover party expenses.

He characterized Tostenson's Feb. 15 memorandum as a rehearsing of problems resolved in the summer of 2006. However, Tostenson's memo says the complaints were unresolved after the November election, and FEC records reflect no deposits in January 2007 into retirement accounts. On Feb. 9 - the same day Tostenson says he was fired - the party recorded an atypically large deposit, according to FEC filings.

Carey said Tostenson has agreed the problems were resolved, and cited a March 13 letter from Tostenson to the executive committee. Tostenson said in the letter that he was confident Carey and a party lawyer "are addressing all matters raised within my memorandum ..."

Tostenson declined to elaborate on his memo Friday, but said: "Do I stand by my memo of Feb. 15th, 2007? I will tell you ... I stand by my memo and the information that is contained in it."

In addition to raising concerns about retirement accounts, Tostenson's memo said Carey was warned numerous times that the party:

- Understated its debts - "\$100,080 plus" - on FEC reports and to the state campaign finance agency.
- Delayed payment of staff expense reports and commissions.
- Failed to make timely payments to vendors.

A GOP source who talked to Tostenson about concerns raised in his memo said the party is required to report overdue bills as debts and obligations on FEC reports, and did not always do so.

Carey said "We feel like we're compliant with FEC regulations." The FEC, he said, has "... brought nothing to our attention that we are out of compliance in this area."

In his memo, Tostenson also urged the party leaders to hold "those responsible for any illegal activity accountable, to minimize the Party's political and legal liability."

He wrote that suspected illegal activities were brought to Carey's attention numerous times since May 2006. "He asked me to wait until after the election, at which time he assured me he would correct the numerous issues," Tostenson wrote.

After the November election, he said, Carey gave him permission to send documents to the party attorney supporting his claims. Two weeks later Carey told Tostenson that they were cutting his pay by 40 percent, which Tostenson believed was retaliation.

Carey did not directly answer questions about the alleged retaliation.

#### Watercooler discussions

Another staff member who left the party after raising concerns was Larissa Presho, a former finance assistant, who worked more than a decade for the party. In a Jan. 16th e-mail to Carey and other party leaders, she raised serious concerns about the behavior of the deputy treasurer, Larissa Taubenberger.

The newspaper obtained a copy of Presho's e-mail memo. In it, she said that Taubenberger had encouraged her to mislead state revenue auditors and also encouraged her and another employee to mislead insurance auditors.

Her e-mail says employees did not carry out Taubenberger's suggestions on insurance and taxes. Carey said the party did nothing improper.

Presho also wrote that she refused an offer of \$5,000 from Taubenberger to marry a Colombian living illegally in the U.S., so that he could remain in the country.

Carey said he discussed this immigration matter with the party's legal counsel. "We didn't feel like we had any obligation to pursue this," he said. "It's something that I don't think is relevant to the operation of the party. I mean, there's watercooler discussions about a lot of things that people have on personal issues."

Asked about Tostenson's memo, Taubenberger declined to comment and referred a reporter to the party. Taubenberger voluntarily left the party organization in mid March, the party said.

Presho voluntarily resigned a month later. She said party leaders never asked her about the January e-mail.

Pat Doyle - 651-222-1216 [pat-doyle@startribune.com](mailto:pat-doyle@startribune.com) Dan Browning - 612-673-4493 [dbrowning@startribune.com](mailto:dbrowning@startribune.com)

#### READ THE MEMO ONLINE

To read the Feb. 15 memo that Dwight Tostenson sent to the executive committee of the Minnesota Republican Party, go to [www.startribune.com/a2884](http://www.startribune.com/a2884).

LOAD-DATE: June 5, 2007

LANGUAGE: ENGLISH

GRAPHIC: PHOTO

PUBLICATION-TYPE: Newspaper

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**EXHIBIT B**

**Confidential Memo**

**To: RPM State Executive Committee**

**From: Dwight Testerson**

2007 JUL 16 P 3 47

**Date: February 15, 2007**

**Re: 2007 Budget**

**Background:**

I feel the professional obligation to bring some concerns to your attention. My staff and I, over my tenure of more than a decade, have always worked in the best interest of the Party. While at the Party I have had the opportunity to work under four Chairmen. My allegiance is now and always has been to the State Executive Committee, State Central Committee and the Party as an institution. If my motives were anything else, I would not be writing this memo.

First a little background information. My employment contracts have always (except for one year) included performance bonuses based on exceeding our net dollar budgets. Upon my return in July of 2003 from a short hiatus, my contract was to pay me 2.5% of gross Major Donor revenue monthly. (10% is the going rate.) This was to compensate me for taking on Major Donor fundraising responsibilities and directing staff in that regard in 2003 and 2004.

I have always overseen Major Donor fundraising, but in the past we had hired a consultant, Zandra Wolcott, to execute this function. And as a consultant she received 10% commissions on major donor money she raised. After Zandra's departure in the fall of 2004 and upon my return in July of 2005, we decided I would perform this function (in addition to my other responsibilities) with the assistance of staff who also received small commissions. In 2005 our staff was inexperienced but broke historic records for a non-election year, generating just short of \$1 million dollars in Major Donor revenue. After some staff turnover in May of 2006, Chris Guckel came on board in June and together with the help of the Governor and Chairman we ended the year raising just under \$2 million dollars in major donor revenue. This is a fundraising record for Major Donor revenue in an election year. In the two consecutive years after I took on the Major Donor fundraising responsibility we have had record years.

**Overview:**

After the election I obtained the permission of the Chairman to forward to RPM counsel, Matt Haspeja, copies of emails I had sent to the Chairman over the course of many months.

These e-mails informed our Chairman that based upon my research and experience, I believe that the Party had been, among other things, violating FEC law by under-reporting the Party's outstanding obligations/expenses and by using retirement funds withheld from employees paychecks to pay Party expenses instead of depositing those funds on a timely basis into the employees' ERA retirement accounts.

The misappropriation of employees' ERA (Retirement Accounts) money, which was withheld from our payroll checks and not deposited into our account, I believe is a violation of federal law. As reported on our payables at the State Executive meetings last summer there was as much as \$12,000 not deposited at any one time. This represented months of paycheck withholdings by the Party which had not been deposited within the 30 day legally required time limit. As one of the Party's oldest employees, I take full advantage of the maximum contribution limits to my ERA as I plan for my retirement. So the action of not depositing these funds as required impacts me more than any other employee, as a larger amount of my paycheck is withheld.

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I have been told that over the last few months that RPM legal counsel is working on a response to the issues brought to the Chairman's attention. However, I was told not to contact Party Counsel regarding these issues. In a meeting with the Chairman and the Executive Director, Ben Galant on Tuesday, November 28, just two weeks after I sent RPM counsel the documentation, the Chairman informed me that my compensation package would no longer include commissions for major donors or a net dollar performance bonus structure for 2007. He informed me my total compensation package would be reduced to a \$75,000 per year salary with no bonus or commissions. This is an amount less than I have earned in any year in the last decade. Using 2006 numbers it would be a decrease in compensation of about 40%.

Singling me out for a dramatic compensation reduction, after we have raised a historic level of revenue (both in Major Donor and in aggregate) in 2006, in a very challenging political environment - combined with the non-payment of commissions already earned - leads me to believe that this change in my compensation package was retaliatory for insisting the Party address what I believe are illegalities, reporting compliance violations and harassment issues.

I have repeatedly, over the past year, requested payment of 2005 and 2006 commissions on Major Donor revenue which I have earned, but was not paid until my termination on Friday, February 9<sup>th</sup> 2007. The total paid me at that time was \$60,244.

#### **Summary:**

Since I started reporting these suspected violations, I have felt increasing harassment and other types of retaliation. I was repeatedly asked by the Chairman not to respond to this hostile behavior or bring it to others' attention. He asked me to wait until after the election, at which time he assured me he would correct the numerous issues. His solution was to first reduce my compensation and when I didn't quit he terminate my employment along with our Call Center Director, Greg Ruff.

The following is a list of suspected illegal activities that were brought to the Chairman's attention numerous times since May of 2006:

1. Underreporting of our debts and obligation of significant amounts (\$100,000 plus) on our FEC and EPB reports.
2. Significant delays in the payment of staff expense reports. FEC rules require that all expense checks be paid within 30 day or reported as a contribution.
3. Misappropriation of retirement money withheld from employee paychecks and not deposited into their IRA's in the 30 day required by law. Some delays exceeded five months.
4. According to a January 16, 2007 complaint by Larissa Probst, apparent Tax Evasion, Insurance Fraud and other issues.

The following is a list of issues brought to the Chairman's attention which may not be illegal, but do create an unpleasant work environment and hostile relations with RPM vendors, with whom staff must deal with daily:

1. Not paying vendors on a timely basis, bawling them when they call for payment and then refusing to pay interest charges owed them for services rendered in good faith.
2. Significant delays (16+ months) in the paying of Staff on commissions earned. I wasn't paid on any commissions until the day my employment was terminated. Others had to wait for months instead of receiving these payments on a monthly basis per their contract.
3. Our policy of not paying staff for interest charges incurred on their personal Credit Cards when expense reports (some in excess of \$5,000) go unpaid for months (some up to four months). This has cost me and other staff hundreds of dollars just in the past year.

I respectfully request that members of the Executive Committee direct the Chairman to:

- Conduct a full investigation and audit into the issues brought to your attention in this and other staff communications and then address those issues by holding those responsible for any illegal activity accountable, to minimize the Party's political and legal liability.
- Review the policies outlined above and then establish as Party Policy the use of the RPM's line of credit and bank loans, if needed, to provide the cash to pay staff and vendors on a timely basis, with interest if owed.
- Provide me with a reconciliation of my SRA from the year 2000 forward and deposit into my SRA account all money owed to me for my withholdings and employer matches 1) not yet made this year and also 2) withholdings and matches still not made from past years, with interest.
- Help me minimize my tax liabilities for 2007 by allowing me to contribute to my SRA the maximum amount for 2007 from my final check of \$60,244 paid to me on my termination date of Friday, February 9<sup>th</sup>.
- Help me provide for my family as I transition to a new job with a six months severance package including insurance and letter of recommendation that is reflective of my 12 years of service to the Party and our cause.

#### **Conclusion:**

I believe that the reduction in my compensation in December and then termination in February was not for "non-performance" (which is clearly disproved by the \$60,000 owed to me at the time of my termination), but is in fact a retaliatory action by the Party resulting from my efforts to protect the Party and Chairman from legal and political fallout resulting from the issues I have raised in this memo. I was a loyal Party employee to the end and had hoped to transition to other employment with dignity and with minimal impact to our Party and my personal finances. Unfortunately that will not be the case now. I'm not the only employee who has endured the unprofessional and, in my opinion, harassing behavior from those within this organization, but I was the most senior and by far the most vocal. As a former member of the State Executive Committee, State Central Committee and former Congressional District Chair and local Party leader, I feel it is my obligation as a professional and former staff to bring these concerns to the Executive Committee's attention, as you have the oversight responsibility for both policy and operations.

I have enjoyed working for you and with my finance team over the years. As a loyal Republican and former staff person I believe these issues of harassment, retaliation and nonpayment of compensation earned must be addressed. Contracts should be honored, all debts should be reported, employees' retirement funds should not be misappropriated, and co-workers should be treated with respect. Thank you for your time and for your commitment to our Party.

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